

19780305
STATE IDENTIFICATION NUMBER
(If Applicable)

IL0990785453
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

EPA Region 5 Records Ctr.



300763

I. General Information:*

(A) Installation Name: Lemont MFG Co. - Division of CECO Corp.
(B) Street: Stephen St. West CECO Road
(C) City: Lemont (D) State: IL (E) Zip Code: 60439
(F) Phone: 312-257-7701 (G) County: Will
(H) Date of Inspection: 6-12-81 Time of Inspection (From) 9⁰⁰ AM (To) 11⁴⁵ AM
(I) Weather Conditions: 75° Cloudy

(J) Person(s) interviewed	Title	Telephone
<u>John Frawley</u>	<u>Plant Engineer</u>	<u>312-257-7701</u>
_____	_____	_____
_____	_____	_____

(K) Inspection Participants	Agency/Title	Telephone
<u>BRAD Benning</u>	<u>IEPA/Env. Sp.</u>	<u>345-9780</u>
_____	_____	_____
_____	_____	_____

(L) Preparer Information

Name	Agency/Title	Telephone
<u>BRAD Benning</u>	<u>IEPA/Env. Sp.</u>	<u>345-9780</u>

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Producer of hot roll steel bar mill.

- SIC code 3312 -

Generate Electric Furnace Dust - HAZ. WASTE (K061)
Dust is presently being bagged and
transported to Chicago/CID for disposal
using the ILL. manifest and Suppl. permit
system.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>using the ILL.</u> <u>manifest system.</u>
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Name and EPA ID Number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	✓	—	—	_____
7. Required certification?	✓	—	—	_____
8. Required signatures?	✓	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	✓	—	—	_____

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	✓	—	—	Dust is put into bags then into a roll off box.
(E) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	✓	—	—	IF dust is evident the box is wetted down and a tarp is used.
(C) If required, are placards available to transporter?	✓	—	—	_____
(D) Pre-shipment Accumulation:				Dust is collected in steel boxes w/ poly liners. When ~ 4 boxes
1. Are containers marked with start of accumulation date?	—	—	✓	have accumulated they are put into a roll-off box which is then removed ~ once a week. The steel boxes are reused and only the poly-bags are removed.
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	—	✓	

*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers; containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?	___	___	✓	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	✓	<i>No Tanks</i>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	✓	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	✓	_____
d. Are required daily and weekly inspections done?	___	___	✓	_____
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)	___	___	✓	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	✓	_____
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?	___	___	✓	_____

Record the following information:

Tank capacity? N/A gallons

Tank diameter? N/A feet

Distance of tank from property line? N/A feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

YES NO NI* Remarks

A. Do Personnel training records include: (~~Effective 5/19/81~~)

- | | | | | |
|---|---|---|---|---|
| 1. Job Titles? | — | ✓ | — | _____ |
| 2. Job Descriptions? | — | ✓ | — | _____ |
| 3. Description of training? | — | ✓ | — | _____ |
| 4. Records of training? | — | ✓ | — | _____ |
| 5. Have facility personnel received required training by 5-19-81? | ✓ | — | — | <u>employees have received informal</u> |
| 6. Do new personnel receive required training within six months? | ✓ | — | — | <u>Training on hazards and use of equip.</u>
<u>There currently is</u> |

B. Preparedness and Prevention
(Part 265, Subpart C)

- | | | | | |
|--|---|---|---|--|
| 1. Maintenance and Operation of Facility: | — | — | — | <u>no formal training program for handling the dust.</u> |
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | — | ✓ | — | _____ |

2. If required, does this facility have the following equipment?

- a. Internal communications or alarm systems?
- b. Telephone or 2-way Radios at the scene of operations?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

_____ Siren-light, equip failure
Whistle alarm
 _____ Radios - Telephones
 _____ Paging system.
 _____ Signal system-whistle
 _____ Fire exting. 10-40 lbs.
 _____ Portable eye wash and
shower in

Indicate the volume of water and/or foam available for fire control. Filtration unit

FIRE Brigade - hoses throughout plant -
WATER TANK - 75,000 gal, 3500gal/min elect. pump and
standby gas pump. 2000gal/min

3. Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

_____ Weekly service on
extinguishers. Insurance

- b. Is emergency equipment maintained in operable condition?

_____ inspector - annually for
pressure vessels.

4. Has owner/operator provided immediate access to internal alarms (if needed)?

_____ Insurance Co in
contact with safety
manager for OSHA
standards.

5. Is there adequate aisle space for unobstructed movement?

_____ standards.

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

— ✓ — Since their waste

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

— ✓ — is a solid, the

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

— ✓ — basic plan would

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

— ✓ — be to clean-up, the

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

— ✓ — spilled material

and return it
to the disposal
box. The material
is not, reactive
or ignitable, The
company will complet
a formal Contingency
plan for spillage of
the dust.

2. Are copies of the Contingency Plan available at site and local emergency organizations?

— ✓ —

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

— ✓ —

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

— ✓ —

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

— ✓ —

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

No emergency at site.

— — —

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

— ✓ —

(B) Has the generator submitted Annual Reports and Exception Reports as required?

— — ✓ *Annual - suspended
No Exception Report as of yet.*

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

— ✓ —

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing? _____

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country? _____

c. Met the Manifest requirements? _____

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements? _____

VIII. Remarks

REMARKS: Ceco Corp. is currently generating (K061) and disposing
of it at Chicago/CID. They also have three impoundments
on-site which contain ~ 6500 cu yds of K061. These pits
were started back in 1974 and therefore they notified
as a TSD facility. Final Plans are being made for
the removal of all K061 waste from these pits, they
estimate 60-70 days for the removal process. After
removal of the waste they will only be considered a
generator. They also listed a pelletizing process for
their waste, which has since been abandoned, as
the waste can be handled safely in the dust form.
They also should not be listed as a Transporter, as they
intend to contract out all the hauling.